

James E. McGreevey

Governor

Department of Environmental Protection

Bradley M. Campbell Commissioner

Christopher Anderson
Director Environmental Affairs
L.E. Carpenter and Company
33587 Walker Road
Avon Lake, OH 44012

MAR 2 6 2003

RE: L.E. Carpenter Superfund Site Wharton, Morris County, New Jersey

The New Jersey Department of Environmental Protection (NJDEP or Department) has completed a review of the Quarterly Monitoring Report – 4th Quarter 2002 dated January 28, 2003. This document was prepared by RMT, Inc. on behalf of L.E. Carpenter and Company (LE). NJDEP finds the document to be acceptable provided the following comments are addressed.

General Comment:

NJDEP previously noted an increase in the DEHP levels in well MW-11D(R). This well monitors the deep overburden aquifer and is located within the product plume. The deep overburden aquifer is unimpacted by site related contamination, but there has been a steady increase over the past three-quarters. Should this trend continue, measures to control the downward migration of DEHP may be necessary.

Specific Comments:

1. Section 3, Quarterly Groundwater Monitoring, page 15:

The concentration trends for contaminants of concern detected at MW-22R are presented as Appendix D. NJDEP requests that LE provide the Department with an explanation regarding the disappearance of DEHP at MW-22R.

2. Section 5, Drainage Channel Surface Water Sampling, page 21:

The report states that the PDB samplers will not be used because significant amounts of DEHP are known to leach from these devices and that data collected from PDB samplers could not be used to determine actual concentrations of DEHP in sampled media. It appears that the concern for the PDB samplers contributing DEHP to the water sample can be resolved by conducting proper QA/QC water analysis, (i.e., field and trip blanks). DEHP is a common lab contaminant and was detected in the lab samples associated with the 4th quarter ditch sampling. NJDEP again recommends the use of PDB samplers at surface water locations SW-5, SW-7 and SW-8.

Should you have any further questions please feel free to contact me at (609) 633-1416.

Sincerely,

Anthony Cinque, Case Manager Bureau of Case Management

C: Nick Clevett, RMT, Inc. Stephen Cipot, EPA George Blyskun, BGWPA John Prendergast, BEERA